

# PAUL HASTINGS

1(212) 318-6252  
pharaguberman@paulhastings.com

February 27, 2019

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The Honorable Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *United States v. Connolly, et al.*, No. 16 Crim. 0370

Dear Chief Judge McMahon:

On behalf of Defendant Matthew Connolly, we respectfully request permission for Mr. Connolly to travel to Virginia from May 9 through May 12, 2019. The government and Pretrial Services have consented to these requests.

Mr. Connolly's conditions of release were unchanged following the jury verdict in the above-captioned matter, and permit him to travel to the Southern District of New York, the Eastern District of New York, New Jersey and Pennsylvania. Mr. Connolly requests permission to travel outside of this geographical limitation to Williamsburg, Virginia on Thursday, May 9, 2019. Mr. Connolly would travel by car and stay overnight for three nights at his child's home, located at 27 Matoaka Court, Williamsburg, VA 23185. Mr. Connolly would return on Sunday, May 12, 2019.

Mr. Connolly has been fully compliant with the conditions of his release, including several previously-authorized trips. Mr. Connolly recorded a notarized Affidavit of Confession of Judgment securing his Appearance Bond of \$500,000 against his home in Somerset County, New Jersey. He does not pose a flight risk.

Thank you for your consideration.

Sincerely,

**/s/ Phara A. Guberman**

Phara A. Guberman  
of PAUL HASTINGS LLP

cc: Alison L. Anderson, Esq., Assistant United States Attorney (via ECF)  
Michael T. Koenig, Esq., Assistant United States Attorney (via ECF)  
Carol L. Sipperly, Esq., Assistant United States Attorney (via ECF)  
Keyana Pompey, Pretrial Services (via Email)